

J-54170

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually,  
and as Parents of BRETT LOVELACE,  
Deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and  
MARK P. CLEMONS,

Defendants.

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**NOTICE TO TAKE AUDIOVISUAL DEPOSITION  
OF DR. FRANK J. PERETTI**

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Please take notice that counsel for the defendant, Dr. Mark Clemons, pursuant to the Tennessee Rules of Civil Procedure, will take the audiovisual deposition of Dr. Frank J. Peretti, CPA, on June 10, 2014, beginning at 1:30 p.m. at the office of Bushman Court Reporting Agency, 620 West 3<sup>rd</sup> Street, Little Rock, AR 72201.

Please have the deponent bring with him to the deposition the following documents or things:

1. A copy of the witness's current curriculum vitae;
2. All letters, tape recordings, records, reports, notes, computer generated information or other writings or things which pertain in any way to this lawsuit;

3. All letters, tape recordings, records, reports, notes, computer generated information or other writings or things generated by the witness, received by the witness, reviewed by the witness, provided to the witness or reviewed by anyone, including counsel, in the presence of the witness;

4. The witness's entire file in connection with this case;

5. All records, depositions, materials, radiological materials, guidelines, policies, regulations, articles, treatises or any other writings or things provided to or reviewed by the witness in connection with this case;

6. Any other writings or things which serve as a basis for any of the witness's opinions in this case;

7. A list of all lawsuits in which the witness has been a party either as a plaintiff or as a defendant;

8. A list of all cases in which the witness has been identified as an expert;

9. A list of all cases in which the witness has testified as an expert;

10. Copies of all reports, affidavits and depositions of the witness in all of the cases;

11. A schedule of the witness's charges for acting as an expert witness in a lawsuit and a listing of the witness's income derived from such work in lawsuits during each of the years 2007 through the present.

This deposition will be taken upon oral examination for all purposes allowable under the Tennessee Rules of Civil Procedure. The deposition will be taken before an officer authorized by law to administer oaths, and will continue day to day until completed.

Respectfully submitted,

LEWIS THOMASON

By: /s/Marcy D. Magee  
Marcy D. Magee (19360)  
J. Kimbrough Johnson (7953)  
40 South Main Street, Suite 2900  
Memphis, TN 38103  
Phone: (901) 525-8721  
*Attorneys for Defendant, Anna Fong, M.D.*

I hereby certify that a true and correct copy of the following has been served on Mark Ledbetter, Attorney for Plaintiffs, Halliburton & Ledbetter, 254 Court Avenue, Suite 305, Memphis, TN 38103, and Karen Koplon, Jerry Potter and Bradley Gilmer, Attorneys for Defendants, Babu R. Paidipalli & Pediatric Anesthesiologists, P.A., Hardison Law Firm, 119 S. Main St., Suite 800, Memphis, TN 38103, via U.S. Mail, postage prepaid, this 16th day of May, 2014.

/s/ Marcy D. Magee  
Marcy D. Magee